

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

KAYLA MASSEY, as mother of J.L., a minor,)
)
)
)
Plaintiff,)
v.) No.: 3:23-cv-00034
)
)
CORECIVIC, INC., et al.,)
)
)
Defendants.)

**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT (ECF NO. 15)**

Defendants CoreCivic, Inc., CoreCivic of Tennessee, LLC, Damon T. Hininger, Steven Conry, Vance Laughlin, Grady Perry, and Elaina Rodela¹ (hereinafter, "Defendants"), by and through undersigned counsel, respectfully move this Court to dismiss Plaintiff's claims pursuant to Rule 12(b)(6) of the FEDERAL RULES OF CIVIL PROCEDURE. In support thereof, Defendants rely upon their Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiff's First Amended Complaint.

Premises considered, this Court should dismiss Plaintiff's claims in their entirety.

¹ Incorrectly identified in Plaintiff's original complaint and First Amended Complaint as "Elaina Rodella." (ECF Nos. 1 & 15, ¶ 12).

Respectfully submitted,

PENTECOST, GLENN & TILLY, PLLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via US District Court ECF system and/or U.S. Mail postage prepaid upon:

W. Alan Rose
Derek A. Jordan
Attorneys for Plaintiff
THE LAW FIRM, PLLC
111 NW Atlantic Street
Tullahoma, Tennessee 37388

DATE: On this the 10th day of April, 2023.

PENTECOST, GLENN & TILLY, PLLC

By: s/Nathan D. Tilly
Nathan D. Tilly